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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STEVEN WADE, an individual,

Plaintiff,

vs.

C AND S COMPANY INC., a domestic
corporation, and DOES 1 – 20 inclusive,

Defendants.

Case No.: 2:24-cv-01561-RFB-MDC

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH LR
26-1(b)**

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

Under Fed. R. Civ. P. 26(f) and Local Rule 26-1, the parties, through their respective counsel, conducted a telephone conference on September 10, 2024, to generally discuss the claims, and to schedule a discovery planning conference.

Plaintiff's counsel and Defendant's counsel conducted a discovery conference on September 10, 2024, and hereby submits to the Court the following proposed Discovery Plan and Scheduling Order:

A. Initial Disclosures

The parties will make their initial disclosures by **September 24, 2024**.

B. Areas of Discovery

Plaintiffs believe that the areas of discovery should include, but not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.

C. Discovery Plan

The parties Accordingly, the parties propose the following Discovery Plan for this matter as it currently stands (for deadlines that fall on a Saturday, Sunday, or legal holiday have been scheduled for the next judicial day):

Event	Date
Discovery Cut-Off Date	March 10, 2025 (180 days after the parties' discovery-planning conference)
Amending Pleadings and Adding Parties	December 10, 2024 (90 days to close of discovery)
Initial Expert Designations	January 9, 2025 (60 days to close of discovery)
Rebuttal Expert Designations	February 10, 2025 (30 days to close of discovery, next judicial day)
Dispositive Motion Deadline	April 9, 2025 (30 days after discovery closes)
Pretrial Order	May 9, 2025 (30 days after the dispositive motion deadline unless dispositive motions are filed, in which case the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order)

D. Court Conferences

If the Court has questions regarding the dates proposed by the parties, the parties request a conference with the court before entry of the Scheduling Order. If the Court does not have questions, the parties do not request a conference with the Court.

E. Extensions or Modifications of the Discovery Plan and Scheduling Order

All motions or stipulations to extend a deadline set forth in this discovery plan shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline, must satisfy the requirements of LR 26-3, and be supported by good cause for the extension.

F. Alternative Dispute Resolution

The parties certify that they have met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

G. Alternative Forms of Case Disposition

The parties certify that they have considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

H. Fed. R. Civ. P. 26(a)(3) Disclosures

Unless the discovery plan otherwise provides and the court so orders, the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the joint pretrial order.

I. Electronic Evidence

The parties certify that they have discussed and intend to present evidence in electronic format to jurors for the purposes of jury deliberations and will ensure that said evidence is in an electronic format compatible with the Court's electronic jury evidence display system. At present, the parties have not agreed upon any stipulations regarding use of electronic evidence but will address this issue again in the joint pretrial order.

J. Consent to Service by Electronic Means through Electronic Mail

The undersigned, on behalf of Plaintiff and Defendants, hereby consent to service of documents by electronic means via electronic mail and/or by U.S. Mail. Documents served by electronic means must be transmitted to the following persons at the e-mail address below:

- Plaintiff's Attorneys: Jennifer A. Fornetti, Valerie S. Christian and Mark J. Bourassa of
The Bourassa Law Group
 - E-Service Address:
jfornetti@blgwins.com, vchristian@blgwins.com, mbourassa@blgwins.com,
kvandermiller@blgwins.com

- Defendants' Attorneys: Bradley T. Austin, Esq, Paul S. Prior, Esq., Theresa C. Trenholm, Esq., of SNELL & WILMER LLP.

o E-Service Address:

baustin@swlaw.com, sprior@swlaw.com, ttrenholm@swlaw.com

DATED this 20th day of September, 2024

DATED this 20th day of September, 2024

THE BOURASSA LAW GROUP

SNELL & WILMER LLP

By: /s/ Jennifer A. Fornetti

By: /s/ Paul S. Prior

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Attorneys for Plaintiff

Attorneys for Defendant

IT IS SO ORDERED:

Denied with leave to refile.
Stipulation does not comply
with LR 26-1(b)(1). The
180-day standard discovery
period is measured from
date of first defendant
appeared, not the date
of the initial conference.

The stipulation does not
contain any good cause for
the longer discovery period
requested and does not
comply with LR 26-1(a).

The parties shall file a stipulation
in compliance with LR 26-1(b).

The Court will consider discovery
extensions should the need arise and
the parties demonstrate good cause and diligence in pursuing discovery.

UNITED STATES MAGISTRATE JUDGE

DATED: 09-24-24

CASE NO.: 2:24-cv-01561-RFB-MDC

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of The Bourassa Law Group, and that on this date I caused to be served a true copy of **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER** on all parties to this action by the method(s) indicated below:

 X by using the Court's CM/ECF Electronic Notification System addressed to:

Bradley T. Austin, Esq.
Paul S. Prior, Esq.
Theresa C. Trenholm, Esq.
SNELL & WILMER LLP
1700 South Pavilion Center Drive, Ste. 700
Las Vegas, Nevada 89135

DATED: This 20th day of September, 2024.

/s/ Kylie B. VanderMiller
Employee of The Bourassa Law Group